

UNITED STATES BANKRUPTCY COURT  
NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION

IN RE: ) In Proceedings  
          ) Under Chapter 13  
Lolita Nathan, )  
          ) Case No. 15-13096  
Debtor.         ) Honorable Judge Baer

**NOTICE OF MOTION**

To: Brenda Ann Likavec, The Semrad Law Firm, LLC, 20 S. Clark Street, 28<sup>th</sup> Floor, Chicago, IL 60603 via electronic notification;

Tom Vaughn, 55 E. Monroe Street, Suite 3850, Chicago, IL 60603 via electronic notification; and

Lolita Nathan, 12041 S Normal, Chicago, IL 60628 via US Mail.

Please take notice that on September 8, 2016 at 9:30 am, or as soon thereafter as counsel may be heard, I shall appear before the Honorable Judge Baer at the Everett McKinley Dirksen United States Courthouse, Courtroom 615, 219 South Dearborn Street, Chicago, Illinois, or before any other Bankruptcy Judge who may be presiding in said Judge's place, and shall present to the Court the attached motion at which time you may appear if you so choose.

*/s/ Jennifer M. Rinn*  
Jennifer M. Rinn

**CERTIFICATE OF SERVICE**

I, the undersigned attorney, certify that I personally served the above and foregoing notice and motion on the above parties by Electronic Court Notification or by depositing the same in the U.S. Mail chute at 120 S. LaSalle, Chicago, IL before the hour of 5:00 pm on August 26, 2016.

*/s/ Jennifer M. Rinn*  
Jennifer M. Rinn

Kropik, Papuga and Shaw  
120 S. LaSalle, Ste. 1920  
Chicago, IL 60603  
Ph: 312-236-6405

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**MOTION FOR RELIEF FROM STAY**

NOW COMES Specialized Loan Servicing LLC, as servicing agent for The Bank of New York Mellon FKA The Bank of New York, as Trustee for the certificateholders of the CWABS, Inc., ASSET-BACKED CERTIFICATES, SERIES 2006-20 (hereinafter "Movant") by and through its undersigned attorney with Kropik, Papuga and Shaw, moves this Honorable Court pursuant to 11 U.S.C. § 362(d) for an Order granting Movant relief from the automatic stay and in support thereof states as follows:

1. This Court has jurisdiction pursuant to 11 U.S.C. §§§ 361, 362, and 363 of the United States Bankruptcy Code.
2. On October 2, 2006, the Debtor did execute a certain note and mortgage in the amount of \$80,500.00 (Exhibit A), secured by a mortgage on the property commonly known as 12041 S Normal Ave, Chicago, IL 60628 (Exhibit B).
3. On March 30 2015, the Debtor entered into a Loan Modification Agreement effective April 1, 2015 (Exhibit D).
4. Enforcement of Movant's security interest has been stayed automatically by operation of 11 U.S.C. § 362 of the Bankruptcy Code upon Debtor's filing of this petition on April 13, 2015.

5. The Debtor's Chapter 13 plan was confirmed on August 13, 2015. Section C of the plan provides for Debtor to make current monthly mortgage payments directly to Movant. Section E (5) of the plan provides for Movant to receive monthly disbursements from the Chapter 13 Trustee to cure the a pre-petition arrearage claim.
6. As of August 8, 2016, there remains due and owing on the note and mortgage referenced in paragraph two hereof, the unpaid principal balance of \$117,034.49.
7. The Debtor is delinquent on post-petition mortgage payments to Movant. As of August 8, 2016, the default was \$8,266.66, which includes a credit of the suspense balance of \$83.42.
8. Continuation of the automatic stay will cause irreparable harm to Movant and will deprive it of the adequate protection to which it is entitled.
9. Specialized Loan Servicing LLC services the loan on the Property referenced in this Motion. In the event the automatic stay in this case is modified, this case dismisses, and/or the Debtor obtains a discharge and a foreclosure action is commenced on the mortgaged property, the foreclosure will be conducted in the name of Movant or Movant's successor or assignee. Movant, directly or through an agent, has possession of the Note. The Note is either made payable to Movant or has been duly endorsed. Movant is the original mortgagee or beneficiary or the assignee of the Mortgage/Deed of Trust.
10. This Court has authority to order that Rule 4001(a) (3) is waived to the order entered in granting this motion, and Movant requests this Court so order.

WHEREFORE, Specialized Loan Servicing LLC, as servicing agent for The Bank of New York Mellon FKA The Bank of New York, as Trustee for the certificateholders of the CWABS, Inc., ASSET-BACKED CERTIFICATES, SERIES 2006-20, prays this Court enter an Order pursuant to 11 U.S.C. Section 362(d) modifying the automatic stay as to Movant, and for such other and further relief as this Court may deem just and proper.

Respectfully submitted,

/s/ Jennifer M. Rinn  
Jennifer M. Rinn

Kropik, Papuga and Shaw  
120 S. LaSalle, Ste. 1920  
Chicago, IL 60603  
Ph: 312-236-6405